



Kristy Madden
Legal Compliance Specialist, NA Consumer Legal
EMAIL: kmadden@amazon.com

MAILING ADDRESS:
P.O. BOX 81226
SEATTLE, WA 98108-1266

ADDRESS FOR COURIER DELIVERIES:
2021 7th AVE
SEATTLE, WA 98121

February 26, 2016

Via Email and US Mail (w/o attachments)

Mr. Chad Schulze, schulze.chad@epa.gov
Mr. Brett Dugan, dugan.brett@epa.gov
United States Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

Re: Request to Provide Information Relating to the EPA's January 29, 2016, Stop Sale, Use or Removal Order (Docket No. FIFRA-10-2016-0052)

Dear Messrs. Schulze and Dugan,

This letter responds to the January 29, 2016, Request to Provide Information Relating to the EPA's (1) August 26, 2015, Request for Information (Docket No. FIFRA-10-2015-0141) and (2) January 29, 2016, Stop Sale, Use or Removal Order (Docket No. FIFRA-10-2016-0052).

First, the EPA requested for Amazon to "explain Amazon's practice of assigning and recording identification numbers for products" and to "explain the relationship between the two [identification] numbers, i.e., whether the products marked with BCN X000NBN2IT are the same as the products marketed on amazon.com with ASIN B004PT3UD6." "ASIN" stands for "Amazon Standard Item Number." An ASIN is used by Amazon to uniquely identify products offered on our site and is automatically assigned when a seller creates a new product in our catalog. As background, third-party sellers may either fulfill orders themselves or use our Fulfillment by Amazon ("FBA") service. When a seller uses FBA and ships a product to an Amazon fulfillment center, the product is assigned a Fulfillment Network SKU ("FNSku"), which is an additional identifier that allows us to determine what inventory can be used to fulfill the seller's orders. An FNSku is a 10-character string, and may be either the same as the ASIN number or an "X000-" number. Each ASIN has one or more FNSkus. In the example you provided, the FNSku X000NBN2IT corresponds to units of ASIN B004PT3UD6 owned by seller KM Distribution.

Second, below are responses to each of the EPA's requests for records related to "HUA Highly Effective Cockroach Killing Bait Powder," "R.B.T.Z. Highly Effective Cockroach Killing Bait Powder," "Green Leaf Powder Fly Killing Bait," Abundant Living's Natural Diatomaceous Earth Powder," "ARS Mat 12," and "Rodent Defense" products ("products"). Please note that all of the identified products have been removed from Amazon.com, and we have created filters to identify and remove future listings of these products.

- (a) EPA Request for Records: A description of all existing product inventory, including the location(s) where the products are held and total quantities.

Amazon Response: Attached hereto, please find an Excel Spreadsheet titled "Amazon Response to EPA Request Docket No FIFRA-10-2016-0052" with information regarding product inventory in any of its Fulfillment Centers as of February 16, 2016 ("Fulfillment Center Inventory" tab). Also, the "Fulfillment Center Addresses" tab includes Amazon fulfillment center location information. Please note that this document is designated confidential and may be used only for the purposes of this investigation.

- (b) EPA Request for Records: A complete list of current and former Amazon distributors and sellers of such products, including their addresses.

Amazon Response: Attached hereto, please find an Excel Spreadsheet titled "Amazon Response to EPA Request Docket No FIFRA-10-2016-0052" with information regarding current and former Amazon distributors and sellers that sold these products. Please note that this document is designated confidential and may be used only for the purposes of this investigation.

- (c) EPA Request for Records: Records of all sales and distributions of such products fulfilled by Amazon or Amazon's affiliates in the past three (3) years. These records should include the product ASIN, the product name, the product seller's name, name and address of the origin of shipment, the date the shipment, the name and address of the destination of the shipment, and the quantity of products shipped.

Amazon Response: Attached hereto, please find an Excel Spreadsheet titled "Amazon Response to EPA Request Docket No FIFRA-10-2016-0052" with information regarding all sales through Amazon.com, including sales by third-party merchants, in the past three (3) years. Please note that this document is designated confidential and may be used only for the purposes of this investigation. Also, please note that any customer contact information has been redacted from the order details.

Please feel free to contact me if you have any additional questions or if we can be of further assistance.

Sincerely,



Kristy Madden

Legal Compliance Specialist, NA Consumer Legal

Amazon.com | 2021 7th Ave. Seattle, WA 98121

[e] kmadden@amazon.com